

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Re: D.I. 14, 63, 72, 81, 153

**CERTIFICATION OF NO OBJECTION REGARDING “DEBTORS’ MOTION FOR
ENTRY OF INTERIM AND FINAL ORDERS (A) ESTABLISHING NOTICE AND
HEARING PROCEDURES FOR TRADING IN EQUITY SECURITIES IN THE
DEBTORS AND (B) GRANTING OTHER RELATED RELIEF” [D.I. 14]**

The undersigned hereby certifies that, as of the date hereof, he has received no answer, objection, or any other responsive pleading to the *Debtors’ Motion for Entry of Interim and Final Orders (A) Establishing Notice and Hearing Procedures for Trading in Equity Securities in the Debtors and (B) Granting Other Related Relief* [D.I. 14] (the “**Motion**”) filed by the debtors and debtors in possession in the above-captioned cases (collectively, the “**Debtors**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”) on June 27, 2023.²

The undersigned further certifies that he has reviewed the Court’s docket in these cases and no answer, objection, or other responsive pleading to the Motion appears thereon. Pursuant to the *Notice of Entry of “Interim Order (A) Establishing Notice and Hearing*

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

² On July 24, 2023, the Debtors filed the *Supplemental Declaration of Adam Kroll In Support of Debtors’ Motion For Entry of Interim and Final Orders (A) Establishing Notice and Hearing Procedures For Trading In Equity Securities in the Debtors, and (B) Granting Other Related Relief* [D.I. 153] (the “**Supplemental Kroll Declaration**”) in further support of the final relief requested in the Motion.

Procedures for Trading in Equity Securities in the Debtors and (B) Granting Other Related Relief” and Final Hearing Thereon, dated June 28, 2023 [D.I. 72] (the “**Notice of Entry of Interim Order**”), responses to the final relief requested in connection with the Motion were to be filed no later than 4:00 p.m. (Eastern Daylight Time) on July 20, 2023 (the “**Objection Deadline**”³). Pursuant to the Notice of Entry of Interim Order, if no objections to the Motion are filed prior to the Objection Deadline, the Court may enter an order granting the final relief requested in the Motion without further notice or hearing. The Debtors therefore respectfully request that the proposed form of final order attached hereto as **Exhibit A**, which is materially in the same form filed with the Motion⁴, be entered at the earliest convenience of the Court.

[Remainder of page intentionally left blank.]

³ The Debtors agreed to extend the Objection Deadline for the Official Committee of Unsecured Creditors (the “**Creditors’ Committee**”) only until 11:00 a.m. (Eastern Daylight Time) on July 24, 2023. The Creditors’ Committee did not file an objection to the final relief requested in connection with the Motion by the Objection Deadline, as extended for it.

⁴ A redline of the proposed form of final order attached hereto as **Exhibit A** marked against the proposed form of final order filed along with the Motion is attached hereto as **Exhibit B** for the Court’s reference. The only change to the proposed form of final order attached hereto as **Exhibit A** was to add reference to the Supplemental Kroll Declaration.

Dated: July 25, 2023

Respectfully submitted,

/s/ Jason M. Madron

RICHARDS, LAYTON & FINGER, P.A.

Kevin Gross (No. 209)
Daniel J. DeFranceschi (No. 2732)
Paul N. Heath (No. 3704)
Amanda R. Steele (No. 5530)
Jason M. Madron (No. 4431)
James F. McCauley (No. 6991)
One Rodney Square
920 N. King Street
Wilmington, DE 19801
Telephone: (302) 651-7700
Facsimile: (302) 651-7701
gross@rlf.com
defranceschi@rlf.com
heath@rlf.com
steele@rlf.com
madron@rlf.com
mccauley@rlf.com

WHITE & CASE LLP

Thomas E Lauria (admitted *pro hac vice*)
Matthew C. Brown (admitted *pro hac vice*)
Fan B. He (admitted *pro hac vice*)
200 South Biscayne Boulevard, Suite 4900
Miami, FL 33131
Telephone: (305) 371-2700
tlauria@whitecase.com
mbrown@whitecase.com
fhe@whitecase.com

David M. Turetsky (admitted *pro hac vice*)
1221 Avenue of the Americas
New York, NY 10020
Telephone: (212) 819-8200
david.turetsky@whitecase.com
Jason N. Zakia (admitted *pro hac vice*)
111 South Wacker Drive, Suite 5100
Chicago, IL 60606
Telephone: (312) 881-5400
jzakia@whitecase.com

Roberto Kampfner (admitted *pro hac vice*)
Doah Kim (admitted *pro hac vice*)
RJ Szuba (admitted *pro hac vice*)
555 South Flower Street, Suite 2700
Los Angeles, CA 90071
Telephone: (213) 620-7700
rkampfner@whitecase.com
doah.kim@whitecase.com
rj.szuba@whitecase.com

*Proposed Co-Counsel to Debtors and
Debtors in Possession*